

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 25-cr-8

LI XING et al.,

Defendant.

**JOINT UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE PRETRIAL MOTIONS**

Defendants Li Xing, Kaiyu Huang, Shawn Senter, Kevin Eisenhauer, Shelton Thorton, Skylar Trumbo, John Perry, and Adham Blandin, by their counsel, move this court for an order extending the time to file pretrial motions by 45 days, or until August 29, 2025. In support of this motion, counsel asserts:

1. On January 22, 2025, all defendants were indicted on a fourteen-count indictment charging various drug and gun offenses. Dkt. 1. On the government's motion, the Court designated the case as "complex." Dkt. 20. The Court held an initial scheduling conference on February 25, 2025, at which time the parties agreed to a speedy trial finding and a continued status hearing in approximately 60 days. Dkt. 36. At that time, not all defendants had appeared in the district. On April 25, 2025, the parties appeared before the Court for another scheduling conference. At that time, the defendants had all appeared in the district, and the Court set a motions deadline of July 14, 2025.

2. The defendants need additional time to assess the viability of motions and, per the local rules, confer with the government about the factual disputes underlying motions and the need for an evidentiary hearing. Additionally, several of the defendants are involved in plea negotiations with the government. Thus, additional time will allow those negotiations—which would obviate the need for any motions—to play out. Other counsel are currently in trial and involved in meeting other pressing deadlines.

3. This is the defendants' first request for an extension of time to file pretrial motions. A motion deadline in approximately 45 days should suffice to allow defendants and counsel the time to prepare any pretrial motions.

4. Counsel for the defendants have communicated with Assistant United States Attorney Katherine Halopka-Ivery, who has indicated that the government does not oppose this request.

For these reasons, defendants respectfully asks that the Court extend the time for filing motions, and require motions to be filed by August 29, 2025. Responses would be due September 14, 2025, and any replies would be due September 21, 2025. The parties also ask that the Court make the appropriate speedy trial findings.

Dated at Milwaukee, Wisconsin, this 14th day of July, 2025.

Respectfully submitted,

/s/ Joshua D. Uller

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